

From: GROUP ERB-REG-VI 214-665-2252
To: R6DAL02.R6HAZRD1(KNOWLES-JAMES), RTPMAINHUB.WPXGATE...
Date: Tuesday, August 27, 1996 3:17 pm
Subject: Castex System POLREP 1

From: GROUP BATON-ROUGE-TAT
To: R6DAL01.R6TOXLAN(BLACK-BRENDA), R6DAL02.R6HAZRD1(BR...
Date: Tuesday, August 27, 1996 11:13 am
Subject: Castex POLREP 1

POLREP NO: 1 (REMOVAL)

Date: 08/26/96
Subject: CASTEX SYSTEMS REMOVAL
From: Mike Ryan, OSC, U.S. EPA, Region VI, ERB
(214/665-2270)
To: Director, ERD and Region 6
Charles A. Gazda, Chief, ERB, Region 6
Case Officer, Case Team, NPFC; Commander,
CG-D8 (M) MLC-LANT Contracting Officer; Commander,
CG-GST Louisiana Department of Environmental
Quality (LDEQ)

Site ID#: ~~144~~ (144)
FPN No: 08-6-114
CERCLIS No: N/A
Delivery Order No:
Awaiting
MLC-LANT
N/A
Response Authority: OPA
ERNS No:
NPL Status: N/A
State Notification: LDNR
Action Lead: FUND
Start Date:
8/19/96
Incident Category:
Inactive Disposal Facility
Completion Date:
Action Memorandum Status: N/A
Event Qualifer: ER

I. SITUATION INFORMATION

A. Site description

The Castex System Site is a nonhazardous oil-field waste (NOW) disposal facility that was abandoned in 1989 shortly after a fire and catastrophic failure of the produced water storage tank battery. The

90068507



site is located at Lat 30° 11' 10", Lon 92° 36' 55", approximately three miles east of Jennings, Jefferson Davis Parish, Louisiana. The facility is in a rural area and is situated adjacent to a marsh and one mile east of the Mermentau River.

B. Description of threat

Approximately 9700 barrels (bbls) of NOW fluids are contained in 19 above ground storage tanks (ASTs, varying in condition from fair to poor. The failed storage tanks contained naturally occurring radioactive material (NORM) sediments that were spilled into the containment basin and mixed with oily sludge. The containment basin has been breached on the south side and is releasing oily water and NORM sediments into the marsh. The marsh flows into the Mermentau River which flows through Grand Lake to the Gulf of Mexico. The facility also has eleven waste management units (WMUs) that contain approximately 20,400 bbls of oil-based material, 96,319 bbls of

salt-base material, and 17,100 bbls of rainwater.

Chemicals of concern are barium, arsenic, benzene, crude oil waste, and NORM.

C. Preliminary Assessment Results

Air monitoring around the ASTs and WMUs for volatile organic compounds (VOCs), percent oxygen and the lower explosive limit (LEL) indicated no readings significantly different from background. The soil in the primary containment basin has readings of 500 microroetgens/hour (mR/hr), according to a 1995 LDNR survey, which qualifies the material as NORM by Louisiana regulations.

D. Site History/Background

Historical actions taken: The Louisiana Department of Natural Resources (LDNR) permitted the facility to begin disposal of NOW material in September of 1982. The facility accepted oil and water based drilling mud, drill cuttings, produced saltwater, and oily water. Saltwater was injected into the saltwater disposal (SWD) well and solids were stockpiled in WMUs for treatment. The LDNR ordered the facility closed in August of 1989, based on violations of Statewide Order No. 29-B, by Administrative Order No. UIC 89-2. The LDNR requested assistance from EPA Region 6 ERB in May of 1996.

II. SITE INFORMATION

A. Site Activities to Date

EPA, USCG-GST, the Basic Ordering Agreement (BOA) contractor Emtech Environmental Services, and START mobilized to the site and began clearing weeds and debris from the site, delineating WMUs and potential NORM areas. A quality assurance and sampling plan (QASP) is being developed to determine disposal requirements. The LDNR is checking into permits required to utilize the on-site SWD well (SN 034959). EPA is meeting with LDEQ and LDNR to determine various disposal options

B. Next Steps:

Implementation of the QASP for disposal determination. EPA will continue to coordinate with LDEQ and LDNR for SWD well usage and state removal requirements.

C. Key Issues:

Deed and Title Search is on-going to determine current status of PRPs for enforcement action and cost recovery through the fund center.

III. PROPOSED ACTIONS

Dispose of NOW liquids, preferably through use of on-site injection well (SN 034959). Excavation of NOW solids and disposal of same at a state permitted facility. Excavation of NORM contaminated material and disposal of same at a state permitted facility. Plug and abandon (P&A) the SWD well and restore site to grade.

IV. COST INFORMATION

As of COB on 25 August 1996.

| Ceiling | Amount Obligated | Cost to Date |
|---------|-------------------------|--------------|
| | FPN <u>\$250,000.00</u> | |
| | Contractor Total | \$24,314.62 |
| | Personnel | \$17,450.00 |
| | Equipment | \$6,500.20 |
| | Material | \$50.00 |
| | Sub-Contract | \$314.42 |
| | Government Total | \$10,261.92 |
| | EPA | \$2,172.00 |
| | USCG-GST | \$6,126.00 |
| | START | \$1,963.92 |
| | Site Total | \$34,576.54 |

Percent of Project Funds Remaining: 86%

Case Pends

OSC: Mike Ryan P.E.
START PM: Will Farrar

FPN
ATP

08-6-

50,000

100,500